

Dear Arleta,

APP/24/00822 | Rebuild the existing concrete walling and revetment to the east of the slipway. Reduce the footprint of the concrete defences and return part to foreshore. Height of the new defence will be at 4.0m OD, raising by 5-10cm max. Reinforce the earth embankment to the west of the slipway with sheet piling, and raise bank by approx 50cm. | 9 Harbourside, Havant, PO9 1TJ

Thank you for consulting me on this application. The application is accompanied by an Environmental Statement (EcoSupport, April 2025) and a Shadow Habitats Regulations Assessment (EcoSupport, April 2025). I welcome the submission of detailed ecological information in order to assess the potential impact pathways in this highly sensitive location. The site is within an extremely sensitive location, immediately adjacent to areas of international, national and local nature conservation value, namely Chichester Harbour Site of Special Scientific Interest, Solent Maritime Special Area of Conservation, and Chichester & Langstone Harbours Special Protection Area and Ramsar site.

The applicant's ecologist has recently provided evidence of correspondence with Natural England's Data Science Service Manager that indicates that the online mapped boundaries of the SSSI, SAC, SPA and Ramsar do not reflect the original paper-mapped boundaries. The paper copy (made at the time of designation) constitutes the official legal boundary, and the online version has now been amended to mean high water for the SSSI, and similar amendments will be made to the international sites in due course. In summary, for the purposes of this application the boundaries of all relevant national and international sites is taken to be mean high water. I note that the ES and HRA both make reference to the internationally designated sites being within the proposed development footprint and therefore a 'worst case scenario' is detailed (these documents were drawn up prior to NE's confirmation on boundaries).

Given that the designated site boundaries are (or will soon be) amended, the proposed works appear in fact to be located wholly outside the designated site boundaries. As such, impact pathways relate primarily to the construction-phase effects of waterborne and airborne pollution, accidental damage to adjacent protected areas, and noise and visual disturbance. These matters are detailed and discussed within the HRA. Coastal Partners have confirmed to Havant Borough Council that they anticipate no unforeseen negative consequences of this proposal during its operational phase.

In summary, I concur with the impact pathways taken forward for further assessment within the HRA. The HRA then proceeds to its second stage and considers effects on European site integrity. It concludes that the potential impact pathways can be effectively avoided or mitigated through either the implementation of careful working practices or through the sensitive timing of works (as detailed in section 6.1.1 of the HRA). I am in agreement with these proposed avoidance and mitigation measures and their effects. The submitted Construction Environment Management Plan (Cowan, January 2025) includes details of the required avoidance and mitigation measures, and includes details of an appointed Ecological Clerk of Works (EcOW). Again, this is satisfactory.

In conclusion, I am now content with the submitted ecological information. Although the proposed works lie outside the boundaries of the identified national and international designated sites there is still a substantive risk of impacts that have the potential to undermine these sites and the habitats and species for which they have been designated. The immediate area also contains habitats of principal importance as well as supporting various protected and notable species. I am generally content that risks to these habitats and species from the proposed works are manageable. This is of course heavily dependent on works including professional ecological advice and supervision where required.

The proposed scheme will be captured by mandatory Biodiversity Net Gain (BNG) and at the application stage we expect the minimum information requirements as set out in Paragraph 011 of the BNG guidance issued by His Majesty's Government <https://www.gov.uk/guidance/biodiversity-net-gain>. The application currently includes no information on BNG.

If you have any queries, please don't hesitate to contact me.

Kind regards,

Tristan

Tristan Norton

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Advanced notice of leave: 26-30 May 2025, 2-9 July 2025



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